

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

VINCENT LUPPINO, CLIFF STERN, and
JOHN CASIERO, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

MERCEDES-BENZ USA, LLC,

Defendant.

Civil Action No.: 09-005582 (DMC) (JAD)

Document Electronically Filed

**NOTICE OF MOTION
TO QUASH OR ENTER A PROTECTIVE
ORDER REGARDING RULE 30(B)(6)
SUBPOENAS**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that the non-party witnesses Mercedes-Benz dealerships (as identified more specifically in Exhibit A) hereby move pursuant to Federal Rule of Civil Procedure 45 for the entry an Order quashing or entering a protective order regarding the Rule 30(b)(6) subpoenas that were e-mailed to counsel on January 5, 2012, or , in the alternative, a protective order under Rule 26 barring Plaintiffs from obtaining the deposition testimony.

PLEASE TAKE FURTHER NOTICE that the non-party witnesses Mercedes-Benz dealerships rely upon the brief, certification and exhibits filed herewith.

Respectfully submitted,

By: /s/ Jennifer Mara

Jennifer Mara, Esq.
Michael A. Baldassare, Esq.
BALDASSARE & MARA, LLC
570 Broad Street
Newark, New Jersey 07102
Telephone: 973-200-4066
Facsimile: 973-556-1076

*Attorneys for Non-Party
Mercedes-Benz Dealerships*

Exhibit A

Contemporary Motor Car
100 Oceanport Avenue
Little Silver, NJ 07739

Globe Motor Car Co.
1230 Bloomfield Ave
Fairfield, NJ 07004

Intercar, Inc.
92 Hampton House Road
Newton, NJ 07860

Mercedes-Benz of Atlantic City
7018 Black Horse Pike
West Atlantic City, NJ 08232

Mercedes-Benz of Cherry Hill
2151 Rt. 70 W
Cherry Hill, NJ 08002

Mercedes-Benz of Freehold
4380 Route 9
Freehold, NJ 07728

Mercedes-Benz of Morristown
34 Ridgedale Avenue
Morristown, NJ 07962

Mercedes-Benz of Princeton
2910 Route 1
Lawrenceville, NJ 08648

Mercedes-Benz of Flemington
135 Route 31
Flemington, NJ 08822

Prestige Motors, Inc.
405 Route 17
Paramus, NJ 07652

Ray Catena - Union
Ray Catena - Edison
Ray Catena Motor Car Corp.
910 Route 1

Edison, NJ 08817

Benzel-Busch Motor Car Corp.
28 Grand Avenue
Englewood, NJ 07631

Open Road of Bridgewater
1250 Route 22 East
Bridgewater, NJ 08807